

IN THE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

<b>OLIVER SOLOMON, LEANDRA HARRELL and MONTEZ LEWIS WHITBY on Behalf of Themselves and Others Similarly Situated,</b>	§	CA No. 4:17-CV-02952
Plaintiff,	§	JURY DEMANDED
v.	§	
<b>NATIONWIDE INVESTIGATIONS AND SECURITY, INC. &amp; ALLEN HOLLIMAN,</b>	§	
Defendants.	§	

**PLAINTIFFS' MOTION FOR REIMBURSEMENT**

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

The Court's Order dated November 17, 2020 (Dkt. 96) directed the Plaintiffs' counsel to file a motion and supporting affidavits setting forth the services for which they seek reimbursement, the time expended and the reasonable hourly rate sought. Though the Court allowed for the reimbursement of any expenses incurred, because the expenses were so inconsequential, Plaintiffs are not seeking reimbursement.

The Plaintiffs do, as supported by the attached Affidavit of Gregg M. Rosenberg, request attorneys' fees in the amount of \$12,635.00 as follows:

- a. *Plaintiffs' Motion to Strike Defendant's Pleading, Defenses and Evidence or in the Alternative for Default Judgment* (Dkt. 79) Tracey Lewis, 12 hours, Gregg M. Rosenberg, 2.5 hours
- b. *Plaintiffs' Reply to Defendants' Response to Plaintiffs' Motion to Strike Defendant's Pleading, Defenses and Evidence or in the Alternative for Default Judgment* (Dkt. 81) Tracey Lewis, 4.5 hours, Gregg M. Rosenberg, .75 hours
- c. *Plaintiffs' Submission of Defendant Nationwide Investigations and Security, Inc.'s Corporate Deposition Transcript as Requested by the Court* (Dkt. 90) (As well as attendant preparation for and participation in court hearing) Tracey Lewis, 6.5 hours, Gregg M. Rosenberg, 3.75 hours.

d. *Plaintiffs' Response to "Defendants' Response to Court's Request or Information Regarding Due Diligence to Provide Discovery" Response* (Dkt. 92) Tracey Lewis, 5 hours, Gregg M. Rosenberg 2.5 hours.

Accordingly, Plaintiffs request reimbursement in the amount of \$12,635.00.

Respectfully submitted,

/s/ Gregg M. Rosenberg

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Attorney-in-Charge for Plaintiff

OF COUNSEL:

ROSENBERG | SPROVACH

ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2020, I electronically filed the foregoing document with the clerk of the court of the U.S. District Court, Southern District of Texas, using the electronic filing system of the Court. I hereby certify that I served all parties/counsel of record electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Gregg M. Rosenberg

Gregg M. Rosenberg